

Dooley Roberts & Fowler LLP  
Suite 201, Orlean Pacific Plaza  
865 South Marine Corps Drive  
Tamuning, Guam 96913  
Telephone (671) 646-1222  
Facsimile (671) 646-1223

**FILED**  
**DISTRICT COURT OF GUAM**

NOV - 5 2007 

**JEANNE G. QUINATA**  
**Clerk of Court**

Attorneys for Defendant LeoPalace Resort

IN THE DISTRICT COURT  
OF GUAM

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION,	) CASE NO. 1:06-CV-00028
	)
	)
Plaintiff,	)
	)
vs.	)
	)
LEO PALACE RESORT,	)
	)
	)
Defendant.	) <b>DECLARATION OF TIM ROBERTS IN SUPPORT OF DEFENDANT LEOPALACE RESORT'S OPPOSITION TO EEOC'S MOTION FOR PARTIAL SUMMARY JUDGMENT</b>
	)
JENNIFER HOLBROOK, VIVIENE VILLANUEVA and ROSEMARIE TAIMANGLO,	)
	)
	)
Plaintiff-Intervenors,	)
	)
vs.	)
	)
MDI GUAM CORPORATION dba LEO PALACE RESORT MANENGGON HILLS	)
and DOES 1 through 10,	)
	)
	)
Defendants.	)
	)

I, Tim Roberts, declare under penalty of perjury as follows:

1. I am the attorney for Defendant LeoPalace Resort. I have personal knowledge of the matters stated herein, and if called, I could and would testify truthfully thereto.

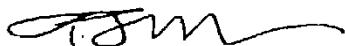
**ORIGINAL**

2. Attached hereto as Exhibit 1 is a true and correct copy of pp. 14-17, 52-54, 57-58, 63, 66, 75-78, 89-90, 111-112, 114-115, and Exhibit C of the Transcript of the Deposition of Christina M. Camacho.

3. Attached hereto as Exhibit 2 is a true and correct copy of pp. 107-109 of the Transcript of the Deposition of May Paulino, and pp. 134-139, authenticating Exhibits 7, 8, 9 and 10.

Under penalty of perjury I declare that the foregoing is true and correct.

Executed this 5<sup>th</sup> day of November, 2007 in Tamuning, Guam.



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**TIM ROBERTS**

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UNITED STATES DISTRICT COURT  
DISTRICT OF GUAM

U.S. EQUAL EMPLOYMENT ) CASE NO. 1:06-CV-00028  
OPPORTUNITY COMMISSION, )  
Plaintiff, )  
vs. )  
LEO PALACE RESORT, )  
Defendant. )  
\_\_\_\_\_  
JENNIFER HOLBROOK, VIVIENE )  
VILLANUEVA, and ROSEMARIE )  
TAIMANGLO, )  
Plaintiff-Intervenors, )  
vs. )  
LEO PALACE RESORT, )  
Defendant. )  
\_\_\_\_\_

DEPOSITION TRANSCRIPT  
OF  
**CHRISTINA M. CAMACHO**

March 15, 2007

**COPY**  
**RECEIVED**  
APR 17 2007  
11:40 am  
DOOLEY ROBERTS & FOWLER LLP

PREPARED BY: GEORGE B. CASTRO  
**DEPO RESOURCES**  
#49 Anacoco Lane  
Nimitz Hill Estates  
Piti, Guam 96915  
Tel:(671)688-DEPO \* Fax:(671)472-3094

1           Q   And how many times did you speak with  
2 Mr. Roberts?

3           A   I met with him once.

4           Q   Okay. And where did you meet with him  
5 at?

6           A   At his office.

7           Q   Okay. And that's his office here in  
8 Guam?

9           A   Yes.

10          Q   And how long did the meeting take  
11 place?

12          A   I'd say about less than an hour.

13          Q   Less than an hour. And, did he call  
14 you or you called him?

15          A   He contacted me.

16          Q   Okay. And did he tell why he wanted to  
17 talk to you?

18          A   Yes.

19          Q   And what did he tell you?

20          A   About the case against Leo Palace,  
21 Equal Opportunity Employment.

22          Q   Okay. And so you came down to his  
23 office and he introduced himself. Did he  
24 introduce himself as an attorney for Leo  
25 Palace?

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1       A    Yes.

2       Q    And did he ask you questions?

3       A    Yes.

4       Q    Okay. And why don't you give us some  
5 substance of the conservation between yourself  
6 and Mr. Roberts?

7       A    I don't really recall.

8       Q    Did he ask you specific questions about  
9 what happened in 2004?

10      A    Yes, he was asking me questions about  
11 that.

12      Q    Okay. And as you sit here today you  
13 don't recall any of the questions that he asked  
14 you?

15      A    He was asking about like the  
16 conservations between Jen, Viv, and Rose and I.

17      Q    Okay. And do you recall when he asked  
18 you about those conservations between Rose,  
19 Viviene and Jennifer?

20      A    Yes.

21      Q    And what did you tell him?

22      A    That we were always joking.

23      Q    Okay. And did he ask about specific  
24 conservations between you and the three women?

25      A    I don't remember.

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1       Q    Well, let me ask you this. Did he ask  
2 you whether or not the three of you spoke about  
3 sexual relations?

4       A    Yes, he asked me.

5       Q    Okay. And was your response?

6       A    Yes.

7       Q    Okay. And did he ask you about  
8 specific incidents?

9       A    Yes.

10      Q    Okay. For instance did he ask you  
11 about an incident involving rolling up of a  
12 paper towel in the shape of a penis?

13      A    Yes.

14      Q    Okay. And what was your response to  
15 that question?

16      A    Yeah, I remember that.

17      Q    Okay. And did that incident happen?

18      A    Yes.

19      Q    Okay. And did you do that?

20      A    I didn't really know how to do it.

21 They're the ones showing me to.

22      Q    I'm sorry, who was showing you?

23      A    The other girls I was with.

24      Q    Okay. So, but you had the paper towel;  
25 is that correct?

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1       A It wasn't -- I can't remember if it was  
2 a paper towel or a wash cloth.

3       Q Okay. Paper towel or wash cloth. But  
4 at the end of the day, it was rolled into the  
5 shape of the penis?

6       A Yes.

7       Q Okay. And what did you do with this  
8 paper towel or towel that you had, shaped of  
9 the penis?

10      A We were just messing around with it.

11      Q You were messing around with it. And  
12 other than -- were all three of these women  
13 present when that happened?

14      A I don't remember.

15      Q Okay. Do you have any memory as to any  
16 of those women being present when that  
17 happened?

18      A I know Rose, because she was always  
19 there.

20      Q Okay. And wasn't Greg Perez also  
21 present?

22      A I don't remember.

23      Q Okay. Was Mr. Suzuki present?

24      A I don't remember.

25      Q Okay. And did he ask you about an

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1       Q     Sure. Did you ask May or any of the  
2 managers and so forth why you were being  
3 terminated for these allegations of sexual  
4 harassment?

5       A     I don't think so.

6       Q     Did anyone actually say to you -- in  
7 the conference you had with May, did she  
8 actually use the term sexual harassment?

9       A     I think so.

10      Q     Okay. So, you knew that someone had  
11 said that you had harassment; is that correct?

12      A     Yes, I believe so.

13      Q     And, you also said you knew it was  
14 because of me, you, but did you deny any of the  
15 allegations that were made against you?

16      A     No, because we were always joking.

17      Q     Did May ask you to submit anything in  
18 writing regarding your side of what happened?

19      A     I'm not so sure. I don't remember.

20      Q     Did any of the managers ask you to  
21 submit anything in writing in your defense as  
22 to any of these allegations?

23      A     I don't think so.

24      Q     Did anyone ask you -- because you said  
25 that you guys were always joking?

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1       A    Yeah.   Because they would joke back,  
2 you know, back and forth.

3       Q    I understand. Yeah, the give and take  
4 among --

5       A    Yeah.

6       Q    -- co-workers.

7       A    So, I didn't really think of anything  
8 that --

9       Q    You didn't think anything was wrong  
10 with it, right?

11      A    Yeah.

12      Q    And no one told you anything was wrong  
13 with it, is that right?

14      A    Because if they told me, I would have  
15 stopped.

16      Q    Okay. And did Rose ever tell you that  
17 she was offended by any of the conduct toward  
18 her?

19      A    No.

20      Q    Did she ever counsel you and tell you  
21 to stop these, you know, making these comments  
22 and so forth?

23      A    She was just like, tell me I think  
24 sometime, "I think that's enough, Christina" or  
25 something.

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1 Q Okay.

2 A "Let's get to work" or something like  
3 that.

4 Q And you just kind of kept on doing it  
5 because everyone kind of was joking back with  
6 you?

7 A Yes.

8 Q And did Greg Perez ever talk to you  
9 about this?

10 A I don't remember him talking to me.

11 Q Okay. And, again, just so we're clear.  
12 The first time that you had heard of any --  
13 the first time you heard of any of the  
14 allegations that in fact you were going to be  
15 fired, was when you have the conversation with  
16 May and she actually let you go?

17 A Yes.

18 Q And were you surprised?

19 A Yes, I was surprised because we were  
20 just always joking around.

21 Q Did May tell you, you could appeal the  
22 termination?

23 A No, she didn't say anything.

24 Q Did she tell you that the decision was  
25 final?

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1 know, the three of you worked together, and the  
2 few times you worked with Jennifer, did you use  
3 sexually explicit language?

4 A We were always joking, so I would think  
5 so, yes.

6 Q Okay. And did you talk about sex?

7 A Yes.

8 Q And did you guys tell jokes and stuff  
9 like that?

10 A Yes.

11 Q And did you ever make sexual comments  
12 to customers?

13 A Yes, one time we were joking around.

14 Q Okay. And was that the time when you  
15 talked about a candle --

16 A Yes.

17 Q -- was actually a vibrator?

18 A Yes.

19 Q And you said that to a customer?

20 A No, because we were talking amongst  
21 ourselves so -- but the customer was right  
22 there.

23 Q The customer was right there. And now  
24 that you've had some training in sexual  
25 harassment, do you believe that was proper?

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1 A No, that wasn't.

2 Q Okay. And did you ever talk about  
3 using a dildo?

4 A I believe so.

5 Q Okay. And you did that on the  
6 workplace?

7 A Yes, I did.

8 Q And now that you've had training in  
9 sexual harassment at your new job, is that  
10 appropriate talk in a workplace?

11 A No.

12 Q Okay. And it's not appropriate for any  
13 of you to talk about that, isn't that correct?

14 A Yes, that's true.

15 Q Okay. And did you talk about  
16 performing oral sex on your girlfriend?

17 A I don't remember.

18 Q Okay. Is it that you just don't  
19 remember or you could have?

20 A I could have, but I don't recall.

21 Q Okay. And did you ever make any kind  
22 of comment that you like to perform oral sex on  
23 your girlfriend when she was menstruating  
24 because you like the taste of blood?

25 A Yeah.

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1 individuals talked to you during the entire  
2 time that you were there that anything you were  
3 doing was inappropriate?

4 A No.

5 Q And no one ever accused you of sexual  
6 harassment until you talked to May on the day  
7 that you were fired?

8 A I think so.

9 Q And did you ask May if any of the other  
10 women were being investigated for participating  
11 in this conduct?

12 A I think I asked her how come they  
13 didn't let me know, because I would've stopped.

14 Q Okay. But, how come they didn't let  
15 you know because you would've stopped. Okay?

16 A Yeah, I would have known that it was  
17 going too far.

18 Q Right. And you know now; you don't it  
19 at all, right?

20 A Yes.

21 Q But at the time that you were at Leo  
22 Palace, no one seemed to really care? Was that  
23 your attitude?

24 A Well, I mean they didn't let me know  
25 what was going on.

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1 that you were fired, you had said that, you  
2 know, if these women would've told me I  
3 would've stopped. But did you ask May anything  
4 -- did you say anything to the effect that, you  
5 know, are these women being disciplined for  
6 anything? Or are they being fired too?

7 A I never questioned it.

8 Q You never questioned it. Do you think  
9 that they should have been fired too?

10 A No, I don't think so.

11 Q Okay. Because they didn't do anything,  
12 right?

13 A Well, I mean, we all joked around, but  
14 — (pauses).

15 Q After you were fired, have you spoken  
16 with Viviene or Rose or Jennifer, since you've  
17 been fired?

18 A Think I met Jen. She came into my work  
19 one day to gas.

20 Q Okay. But it was just pleasantries?

21 A Yeah, I didn't really say much.

22 Q Oh.

23 A Just, hi and that's about it.

24 Q And other than the conversation you had  
25 with Mr. Roberts here, you haven't had any

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1 Q If the person -- hear my question --

2 A (coughs) Sorry. Go ahead.

3 Q Take your time.

4 A I'm running out of water.

5 MR. TORRES: You want that?

6 A What is that?

7 MR. TORRES: These are just breath  
8 mints, and at least it'll coat your throat.

9 BY MR. ROBERTS:

10 Q If a person, in your understanding now  
11 that you've had sexual harassment training, if  
12 a co-worker makes a sexual joke to you, and you  
13 think it's funny and it doesn't bother you, is  
14 that sexual harassment?

15 A No.

16 Q And if you make a sexual joke back to  
17 that person, that person laughs and thinks it  
18 funny, are you sexually harassing that person?

19 A No.

20 Q Okay. This paper towel wash cloth  
21 penis incident, you said you know Rose was  
22 there. Is that what you said?

23 A I'm not too sure.

24 Q Do you remember, was one of the  
25 claimants there? And when I say, claimants, I

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1 mean Rose, Jen- --

2 A Rose was probably there because she was  
3 always.

4 Q Yeah. And do you remember what Rose's  
5 reaction to it was?

6 A I think if I'm not mistaken --  
7 (pauses). I don't recall.

8 Q Do you remember whether Rose ever made  
9 any jokes or maybe asked you any question or  
10 made any comments to you of a sexual nature?

11 A (no audible response)

12 Q You have to speak out loud.

13 A Yes.

14 Q Like what?

15 A You can say, we're like, because, you  
16 know, we always have breakfast. So, she'll say  
17 like she'll bring the sausage, you know,  
18 because she likes sausage. You know, like --  
19 and I'll bring the eggs because I like eggs.

20 Q Okay. I --

21 A In a joking way.

22 Q I know what you're talking about, but I  
23 need you to explain what you mean by sausage  
24 and eggs. What was Rose referring to you when  
25 she said I'll bring the sausage?

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1 A A private part.

2 Q A male penis?

3 A Yes.

4 Q And when you said I'll bring the eggs,  
5 what were you referring to?

6 A The girls.

7 Q Vaginal areas?

8 A Yes.

9 Q Okay.

10 A I mean, you know, that's how -- or  
11 pancakes. You know, it was just --

12 Q And that one, I don't get. What's  
13 pancakes?

14 A I don't know, I guess just pancake. I  
15 don't, you know -- (pause)

16 Q No, I don't. What gender's body does  
17 pancakes -- did the word pancakes referred to?

18 A I don't know.

19 Q But was it of a --

20 A Yeah, just -- you know, the pancakes,  
21 like punket (phonetic), pancakes.

22 Q Oh, like punket (phonetic).

23 A You know, I guess just the -- slang, I  
24 guess.

25 Q Punket (phonetic) is a Chamorro slang

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1 for a female vagina. And in the three months  
2 that you worked there, did Rose ever tell you  
3 that any of your jokes or comments or questions  
4 of a sexual nature were unwanted or unwelcome  
5 or offensive to her?

6 A Not really.

7 Q When you say "not really", can you  
8 explain you answer?

9 A She wouldn't say it like that. She  
10 will just say, you know, tell me, "That's  
11 enough, gotta get back to work" or, you know,  
12 things like that. She wouldn't tell me if was  
13 making anybody feel uncomfortable.

14 Q You said that your relationship with  
15 Rose and the other two, Jenny and Viviene was  
16 professional in nature, you know, co-worker,  
17 right? Would you consider Rose to have been  
18 your friend?

19 A I would consider her friend.

20 Q Jennifer, do you remember any jokes or  
21 comments or questions of a sexual in nature  
22 that may have come from Jennifer toward you?

23 A I don't even remember.

24 Q Do you remember making any jokes or  
25 comments or ask any questions of a sexual in

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1 Q Have you read that to yourself now?

2 A (unintelligible)

3 Q You have to speak up?

4 A Yes.

5 Q Do you see any mistakes in here or  
6 things that you disagree with?

7 A No.

8 Q Is this an accurate account of your  
9 interview with May?

10 A I can say it probably is, I don't  
11 remember. It's been a long time, but it sounds  
12 correct.

13 Q And I think you already testified to  
14 this. If Rose had ever said, "Stop acting  
15 inappropriately" or "Stop acting inappropriate  
16 manner regarding sexual matters", what would  
17 you've done?

18 A I would have stopped.

19 Q And if Rose had ever said, "Stop making  
20 comments of a sexual nature in the work place",  
21 what would you've done?

22 A I would have stopped.

23 Q And how about Viviene, if she had ever  
24 said, "Stop conducting yourself in an  
25 inappropriate way with respect to sexual

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1      matters in a work place", what would you've  
2      done?

3      A      I would have stopped.

4      Q      And what if Viviene had said, "Stop  
5      making a jokes of a sexual nature in the work  
6      place", what would you've done?

7      A      I would have stopped?

8      Q      And the same two question for Jennifer,  
9      if she had said, "Stop acting in an  
10     inappropriate way with respect to sexual  
11     matters in a work place", what would you've  
12     done?

13     A      I would have stopped.

14     Q      And if Jennifer had said, "Stop making  
15     remarks of a sexual nature in a work place",  
16     what would you've done?

17     A      I would have stopped.

18     Q      And did any of those people ever say  
19     any those things?

20     A      Besides, I think Viviene.

21     Q      Yeah, and what Viviene say?

22     A      I think I was making her feel  
23     uncomfortable.

24     Q      Uncomfortable? And so what did you do?

25     A      I stopped.

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1       Q   I think you were asked by Leo Palace's  
2 Counsel whether a humping incident had  
3 occurred, where you basically rubbed up against  
4 somebody, one of your co-workers, I think was  
5 Viviene. Do you remember that?

6       A   No.

7       Q   Could that have happened though?

8       A   I don't think the humpy incident.

9       Q   Okay. When you were doing these  
10 things, telling these jokes and doing these  
11 actions, were you intending to harm anybody?

12      A   No.

13      Q   Okay. Would these things happen though  
14 in like a daily basis?

15      A   (pauses)

16      Q   I mean, you're going to tell jokes --

17      A   Yeah.

18      Q   -- everyday at work and so we're  
19 talking about sexual jokes. And in your sexual  
20 harassment training, and you keep saying, well,  
21 we will joke around. Were you taught that  
22 there comes a point when it's no longer a joke?

23      A   Yes.

24      Q   You would swear at work?

25      A   Yes.

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1       Q     The incident that Mr. Roberts asked you  
2 about, the candle, actually that was the  
3 wedding candle of a guest who was checking-out,  
4 right?

5       A     Yes.

6       Q     And you made a comment that it looks  
7 like a vibrator in his presence, in the guest's  
8 presence?

9       A     Yes.

10      Q     And that was actually referred to also  
11 by May Paulino, that you can't do those kinds  
12 of things?

13      A     Yes.

14      Q     Okay. How come you just didn't realize  
15 you can't do those kinds of things?

16      A     Well, I guess because everybody was  
17 joking, I thought it was okay.

18      Q     Okay. But, this is a guest. This is  
19 different than what you were talking about  
20 before joking.

21      A     Uh-huh.

22      Q     So, Mr. Roberts kept asking you didn't  
23 you understand, you don't need sexual  
24 harassment training, it's common sense. But it  
25 wasn't common sense for you, was it?

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1           A    Just housekeeping.

2           Q    I mean, was she a supervisor? Has she  
3 been working a long time?

4           A    She was working there for a long time.

5           Q    Okay. Did she help you to get this  
6 job? Did she refer you?

7           A    No.

8           Q    You said that when Rose talked to you  
9 her comments were something to the effect that  
10 that's enough. Could she also have said that  
11 that's inappropriate? That you can't behave  
12 like this behind here, behind the desk?

13          A    She probably could have.

14          Q    Yeah. And she did tell you, you have  
15 to stop this kind of behavior, right?

16          MR. ROBERTS:   What was the question?

17          BY MR. TORRES:

18          Q    Did she tell you that you have to stop  
19 this kind of behavior?

20          A    I don't recall, but probably could  
21 have?

22          Q    Okay. Is it fair to say that basically  
23 this behavior, that you referred to as joking,  
24 happened in the time that, you know, shortly  
25 after you started working until really about

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1 the time that you're terminated?

2 A I could say. There were days, I guess,  
3 we weren't busy.

4 Q Did you make these jokes in front of  
5 Mr. Suzuki?

6 A I don't remember.

7 Q Okay. Could you have? Could he have  
8 been aware of your behavior?

9 MR. ROBERTS: Objection, anything's  
10 possible.

11 MR. MCCLINTON: You can still get the  
12 answer.

13 BY MR. TORRES:

14 Q You can answer the question.

15 A Probably. I don't recall.

16 Q Okay. Did Mr. Suzuki ever talk to you  
17 about your behavior while he was at work?

18 A I don't remember him ever talked with  
19 me about it.

20 Q Did you consciously curtail this joking  
21 behavior when Mr. Suzuki was around?

22 A I can't remember.

23 Q Okay. Do you think you might have or  
24 you're just going to be you the whole time?

25 A I don't remember.

**DEPO RESOURCES**

George B. Castro

Court Reporter

Tel.(671)688-DEPO \* Fax(671)472-3094

On August 11, 8:15 AM

May Paulino HR Manager and Cristina Camacho (Front Desk Clerk)

May: Cristina, approximately a month and a half ago, you were verbally warned about physical harassment against another employee.

Cristina: Yes, I think that was awhile back. It was Viviane. Since then I don't joke or do anything to her.

May: Did you slapped Jennifer's Butt?

Cristina: Yes, All she said was like "Hello". then she said that she felt very Uncomfortable. May, we all joke around upstairs. Like Rose, she Asked what is for breakfast. Is it sausage. And I said yeah, I like pancakes. May they ask me about my personal life. I am a Lesbian. And when they ask me, I just tell them out straight. Rose will ask me Who I slept with, or how do I eat pussy from the side. I won't do any Harm to them....but they never told me to stop. We all joke. All of us. We all laugh.

May: Did you ever joke to guest?

Cristina: No.

May: At one time, a guest just married came to front desk and was holding a candle. You told the guest that, the candle is a vibrator?

Cristina: I don't remember. I think so. And the guest just laughed.

May: Cristina, You don't talk dirty jokes to guest. They might not know what you are saying that moment, but sooner or later they will. And am sure they won't appreciate. Then when they get to Japan, they will complaint at home office.

Cristina: It won't happen again. I need this job. Please....

May: I will talk to management and will get back to you as to what the decision would be.

Cristina: Okay.

3

EXHIBIT

UNITED STATES DISTRICT COURT  
DISTRICT OF GUAM

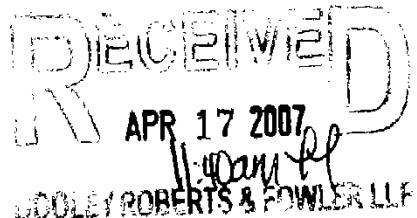
U.S. EQUAL EMPLOYMENT ) CASE NO. 1:06-CV-00028  
OPPORTUNITY COMMISSION, )  
 )  
 Plaintiff, )  
 )  
 vs. )  
 )  
 LEO PALACE RESORT, )  
 )  
 Defendant. )  
 \_\_\_\_\_ )  
 )  
 JENNIFER HOLBROOK, VIVIENE )  
 VILLANUEVA, and ROSEMARIE )  
 TAIMANGLO, )  
 )  
 Plaintiff-Intervenors, )  
 )  
 vs. )  
 )  
 LEO PALACE RESORT, )  
 )  
 Defendant. )  
 \_\_\_\_\_ )

DEPOSITION TRANSCRIPT

OF

**MAY E. PAULINO**

March 13, 2007



**COPY** 2

PREPARED BY:

GEORGE B. CASTRO  
**DEPO RESOURCES**  
#49 Anacoco Lane  
Nimitz Hill Estates  
Piti, Guam 96915  
Tel:(671)688-DEPO \* Fax:(671)472-3094

**EXHIBIT**

1 sexual experiences with other female -- with  
2 other females while they're in the workplace?

3 A Yes.

4 Q Okay.

5 A Uh-huh.

6 Q And did you ask Ms. Camacho when you --  
7 did you interview Ms. Camacho?

8 A Yes, I did.

9 Q Did you ask her about that?

10 A Yes, I did.

11 Q And what she say?

12 A She said that Rose Taimanglo, she said  
13 that they -- Rose Taimanglo and Jennifer and  
14 Christina will ask her about her sexual  
15 relations with a woman. Do you want me to go  
16 in detail?

17 Q Sure. That's why we're here.

18 A Okay. Christina Camacho had told me  
19 that Rose Taimanglo asked her that Rose said  
20 "How do you eat a pussy from the side" and "Why  
21 do you like women instead of men" and "Why do  
22 you sleep, who did you sleep with the night  
23 before?". At one time they were talking about  
24 breakfast and Rose said "I like pancake", and  
25 Christina said, "oh, I like sausage".

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1 Q Okay. And --

2 A That's all.

3 Q That's -- what are the -- I understand.

4 Okay. And after Ms. Camacho told you what  
5 these three women that they would ask her about  
6 this, did you go back and ask them whether or  
7 not they had made these comments to Ms.  
8 Camacho?

9 A Yes, I did.

10 Q And what'd they say?

11 A They said they all laughed about it.  
12 They entertained her. They all joked.

13 Q Okay. That's not what I asked you. I  
14 asked you whether or not they admitted, for  
15 instance you said that Ms. Camacho said that  
16 one of them had asked her about how to eat a  
17 woman's pussy --

18 A Uh-huh.

19 Q -- okay? Did you go back and ask her?  
20 And I forget who it was that you said, said  
21 that. But did you go back and ask her whether  
22 or not she had actually said that to Ms.  
23 Camacho?

24 A I -- it was Ms. Taimanglo.

25 Q Okay. And did you ask her that?

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1           A Yes, I did.

2           Q And what did Ms. Taimanglo say?

3           A She just smiled and she said -- she  
4 just smiled.

5           Q She didn't answer?

6           A She didn't answer.

7           Q Did you ask her why she was smiling?

8           A When I asked her, she smiled and she  
9 just said that they -- they all joked around.  
10 Christina jokes at them.

11          Q Okay. Ms. Paulino, regarding this  
12 particular comment that you, you referred to,  
13 okay?

14          A Uh-huh.

15          Q Did Ms. Taimanglo deny that she'd ever  
16 said that to Ms. Camacho?

17          A I don't remember, sir, she denied.

18          Q During -- the other incidences that you  
19 referred to, the other comments that you said  
20 Ms. Camacho had stated that these women had  
21 said, did these women denied making those  
22 comments to Ms. Camacho?

23          A No, sir.

24          Q Was there any other witnesses who you  
25 interviewed, who heard these women make these

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1 Q Okay. And this went to the same  
2 incident regarding the Camacho being in the  
3 condo and threatening these three young ladies.  
4 Is that correct?

5 A Yes, sir.

6 Q Okay. We'll mark this as Number 6 and  
7 that's -- 0297. The next document I'm going to  
8 ask you to look at is a two-page -- I want to  
9 do it collectively because it looks like it's  
10 two different documents. So let me just run  
11 through them. It's a -- I don't have --

12 MR. McCLINTON: Do you have the Bates  
13 Stamps on yours?

14 MR. ROBERTS: Yes.

15 MR. McCLINTON: Okay. First one I'm  
16 looking at is, at the top it says August 10?

17 MR. TEKER: Yeah. 00189.

18 MR. ROBERTS: It's LPR 00189.

19 MR. McCLINTON: And the second page of  
20 that is 190?

21 MR. TEKER: Yes.

22 MR. McCLINTON: Okay.

23 BY MR. McCLINTON:

24 Q I'm going to show you a two-page  
25 document. It's on Leo Palace Resort

**DEPO RESOURCES**

George B. Castro

Court Reporter

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1 letterhead. The first page is August 10, 2004.  
2 May Paulino, and it says "Anne Rose Taimanglo,  
3 Front Desk Clerk" and there's a second page.  
4 Can you tell me, is this a -- just look at the  
5 front and back and tell me if that's the  
6 complete document regarding that interview?

7 A Yes, sir.

8 Q And what is that document?

9 A It's my investigation report, sir.

10 Q Okay. Investigation report, regarding  
11 who?

12 A Christina.

13 Q Christina?

14 A Camacho, sir.

15 Q Okay. Is that your interview of who?

16 A Rose.

17 Q Rose Taimanglo?

18 A Taimanglo, yes.

19 Q Okay. We'll mark this as 7. And that  
20 was -- is that a complete document there?

21 (Exhibit 7 was marked for  
22 identification)

23 A Yes, sir.

24 Q Okay. There's nothing missing, is that  
25 correct?

**DEPO RESOURCES**

George B. Castro

Court Reporter

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1       A    No, sir.

2       Q    Okay. The second document I'm going to  
3 show you is -- okay. This is a one-page  
4 document, it's dated August 11<sup>th</sup>, I'm sorry,  
5 yeah, August 11<sup>th</sup>, no year, 8:15 a.m., May  
6 Paulino, HR Manager and Christina Camacho,  
7 Front Desk Clerk and it appears to be just a  
8 one page document. And ask you to take a look  
9 at that.

10                     (Exhibit       8       was       marked       for  
11 identification)

12       A    Yes, sir.

13       Q    Is that your interview of Ms. Camacho?

14       A    Yes, sir.

15       Q    And it consisted of just this one page  
16 document?

17       A    Yes, sir.

18       Q    Okay. Well, we'll make that -- that's  
19 8.

20                     MR. McCLINTON: Is there a Date Stamp  
21 Number on that one?

22                     MR. TEKER: 00191.

23 BY MR. McCLINTON:

24       Q    And the next one I'm going to show you  
25 is on Leo Palace Resort letterhead, I believe

**DEPO RESOURCES**

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1 it's a -- it looks like a one page document,  
2 August 11, 2004, 2:45 p.m., May Paulino, HR  
3 Manager and Jennifer Holbrook Front Desk Clerk.  
4 Take a look at that, and when you're finished,  
5 let me know.

6 (Exhibit 9 was marked for  
7 identification)

8 A Yes.

9 Q Have you seen that before?

10 A Yes.

11 Q Are those your notes?

12 A Yes.

13 Q And is that the complete notes of your  
14 interview with Ms. Holbrook?

15 MR. ROBERTS: Her own notes?

16 MR. McCLINTON: Yes, her notes.

17 A Yes, sir. My own notes.

18 BY MR. McCLINTON:

19 Q Okay. And there are no notes other  
20 than these notes, is that correct? Regarding  
21 Ms. Holbrook?

22 A All mine. That's it.

23 Q Okay.

24 MR. McCLINTON: And that one is  
25 probably what, 92?

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1 MR. TEKER: 192.

2 MR. McCLINTON: And that'll be 9.

3 BY MR. McCLINTON:

4 Q And I'll show you a document August 11,  
5 2004 at 1:45 p.m., again document May Paulino,  
6 HR Manager and Viviene Villanueva, I want to  
7 ask you -- take a look at that and tell me if  
8 you have seen that before.

9 A Yes.

10 Q Okay. And did you prepare this  
11 document?

12 A Yes, sir.

13 Q Okay. Does this consist of your  
14 complete and total interview of Ms. Villanueva?

15 A Yes, sir.

16 Q Okay.

17 MR. McCLINTON: And that's 193, right?

18 MR. TEKER: That -- which one?

19 MR. McCLINTON: That -- this one.

20 MR. TEKER: That's -- no. That's 194.

21 MR. McCLINTON: Oh, 194.

22 MR. TEKER: The handwritten notes are  
23 193.

24 MR. McCLINTON: Okay.

25 MR. ROBERTS: Off the record for just

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1 one second?

2 MR. McCLINTON: Sure, sure.

3 (off the record from 11:59 a.m. to  
4 11:59 a.m.)

5 MR. McCLINTON: Okay. So that will be  
6 10, and never identified it, right?

7 (Exhibit 10 was marked for  
8 identification)

9 BY MR. McCLINTON:

10 Q That was 0194. And the Exhibits 10, 9,  
11 8, 7, and 6, that was the documents I showed  
12 you regarding the interviews, those were all  
13 prepared by you, is that correct?

14 MR. ROBERTS: I think Palacios was 6,  
15 I'm not sure of that, though. I think it's 7,  
16 8, 9, 10, and 11.

17 MR. McCLINTON: Oh, I'm sorry, you're  
18 right, you're right. So, it's 7, 8, 9, and 10.

19 BY MR. McCLINTON:

20 Q Those were all prepared by you, is that  
21 correct?

22 A Yes, sir.

23 Q Okay. And those were -- that's a  
24 complete record of your interview with these  
25 three women or the three women regarding the

**DEPO RESOURCES**

George B. Castro  
**Court Reporter**

Tel.(671)688-DEPO \* Fax(671)472-3094



LEO PALACE  
• RESORT •

On August 10, 2004 around 2:20pm Mr Cus

May Paulino HR Manager and Rose Tolentino (Front Desk Clerk)

Rose: May, it's about Cristina...this is going on too much. She slapped my butt.. I don't appreciate it. I have warned her several times. I have warned her verbally, that if she continues on that I will report her to HR office. May, I am concern. You know Jen (Jennifer Holbrook) she had made a comment that she can easily sue this company for sexual harassment with Cristina.

May: Does Mr. Suzuki know what's going on? Did you report this to Mr. Suzuki?

Rose: You know May, Suzuki San is very busy. Always busy.

May: But he should be told. He has to know all these. You are the supervisor you have to tell him.

Rose: Yes.

May: Is Mr. Suzuki working today? I will have to talk with him and get back to you tomorrow.

August 11, 2004 around 7:30 am. I called Rose via cell phone and asked her if Cristina is working today. She said yes. I told her (Rose) to tell Cristina to clock out and go home this; I will talk to her later.

Rose called me and said that Cristina wanted to talk to me, and that Cristina will not leave the premises, but will wait for me. (May)

August 11, 2004 11:25AM

May: Rose, Cristina told me that you folks at front desk jokes with her. That you had asked her, her personal life. Like who does she sleeps with. Like how does she make love to the other women? And how does she eat pussy?

Rose: May, she tells us that herself.

May: When she makes sexual jokes/comments you ladies at front desk entertain her?

Rose: Yeah, we laughed.

EXHIBIT

7

May: So you entertain her. You as a supervisor should have told her to stop his acts...that it is not acceptable and to stop it. Then she would know. As long as no one is telling her, she will continue on.

Rose: May I told her several times. I warned her several times. So she knows.

May: Did you document those verbal warnings?

Rose: No.

May: Whenever you talk to your staff you warned them verbally, always write it down in black and white. Get a notebook, make a file for yourself. Whatever it is write it down. If you say You reported it to me or Mr. Suzuki, then if anything should happen, you would not be blamed for. It is out of your hands. Just anything document it down for your own protection. How do you feel if Cristina was to continue working at front desk.

Rose: May, I feel sorry for her. This is the only job she has. Her other job she is no longer working there. She tells us she still is..but really, she is not. I will forgive her for what she has done to me. I feel for her.

May: I will talk to Mr. Ijima and Mr. Suzuki about this. Then a decision will be made. I will keep you posted.

On August 11, 2:15 AM

May, Paulino HR Manager and Cristina Camacho (Front Desk Clerk)

May: Cristina, approximately a month and a half ago, you were verbally warned about physical harassment against another employee.

Cristina: Yes, I think that was awhile back. It was Viviane. Since then I don't joke or do anything to her.

May: Did you stopped Jennifer's Butt?

Cristina: Yes, All she said was like "Hello". then she said that she felt very uncomfortable. May, we all joke around upstairs. Like Rose, she Asked what is for breakfast. Is it sausage. And I said yeah, I like pancakes. May they ask me about my personal life. I am a Lesbian. And when they ask me. I just tell them out straight. Rose will ask me Who I slept with, or how do I eat pussy from the side. I won't do any harm to them...but they never told me to stop. We all joke. All of us. We all laugh.

May: Did you ever joke to guest?

Cristina: No.

May: At one time, a guest just married came to front desk and was holding a candle. You told the guest that, the candle is a vibrator?

Cristina: I don't remember. I think so. And the guest just laughed.

May: Cristina, You don't talk dirty jokes to guest. They might not know what you are saying that moment, but sooner or later they will. And am sure they won't appreciate. Then when they get to Japan, they will complain at bonus office.

Cristina: It won't happen again. I need this job. Please....

May: I will talk to management and will get back to you as to what the decision would be.

Cristina: Okay.





On August 11, 2004 2:45 PM Country Club

May Pauline HR Manager and Jennifer Holbrook (Front Desk Clerk)

May: Okay, Tell me what's going on with Cristina.

Jennifer: Am sure that she was brief regarding sexual harassment when she first worked. Yes, she knows her work.. Like all the girls. She knows how to make the keys, etc....

May: Yes, All employees are brief regarding sexual harassment on the first day of employment. Sexual harassment is a very sensitive matter, and it has to be corrected immediately.

Jennifer: She is weak in her customer service , too much on the telephone she uses profanity in front of all of us. One day she spanked my butt and I was so uncomfortable. I told her no one touches body. She has no right to spanked my behind. She at one time pulled out her breast to one of the bell staff, she flashes her boobs to Mr. Jimm she is very disrespectful.

May: Did Mr. Jimm say anything when she flashed her boobs in front of him? she was told not to do that. You folks (Front Desk Staff) jokes with her. You folks entertained her sexual jokes?

Jennifer: Yes, at times we laughed about it..

May: That's the mistake. If she makes sexual comments/ jokes and you folks don't appreciate. You should tell her to stop immediately. tell her to stop.. And then she knows that you really don't like her comments/jokes. As long as you don't tell her she will continue on to make those comments.

Jennifer: Yes!

May: How do you feel if she was to continue working at front desk. No decision has been made yet. I just want to hear your from you.

Jennifer: I am very uncomfortable... when I heard what she did the past day I feel so disgusted with her. She is very disrespectful! She spends too much time on the phone.

EXHIBIT

9

On August 11, 2004 1:45PM

May Pauline HR Manager and Vivian Villanueva Front Desk Clerk

May Pauline: Vivian, you're here because of the previous incidents that were reported to me regarding Cristina Camacho for sexual harassment.

Sometimes back 1 ½ months ago, Greg Perez (FD Night Manager) talked to me (May) that you (Vivian) had mentioned to him that Cristina placed her hand on your buttocks and you were taken by surprise. I told Greg Perez to talk to Cristina regarding this incident.

Vivian: Since then Cristina does not joke or talk to me in any form of harassment. She is a good person sometimes very aggressive. I feel comfortable to work with her now. If I don't want her to bother me, I just stay away from her, and she stays away from me. she's okay now.

May: So you're comfortable working with her now. No problem. With her?

Vivian: No.

May: Alright, Once I complete this interview with other staff's involved I will get back to you regarding her status.

Vivian: Okay.

EXHIBIT

10